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Attorneys for Defendants, Fidelity National
Title Insurance Co. of New York and Nations
Title Insurance of New York, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC.,

Plaintiff,

v.

CRISTO PROPERTY MANAGEMENT, LTD., a/k/a
G.J.L. LIMITED; DEK HOMES OF NEW JERSEY, INC.;
OAKWOOD PROPERTIES, INC.; NATIONAL HOME
FUNDING, INC.; CAPITAL ASSETS PROPERTY
MANAGEMENT & INVESTMENT CO., INC.; CAPITAL
ASSETS PROPERTY MANAGEMENT, LLC; WILLIAM
KANE; GARY GRIESER; ROBERT SKOWRENSKI, II;
RICHARD CALANNI; RICHARD DiBENEDETTO;
JAMES R. BROWN; THOMAS BRODO; ROLAND
PIERSON; STANLEY YACKER, ESQ.; MICHAEL
ALFIERI, ESQ.; RICHARD PEPSNY, ESQ.; ANTHONY
M. CICALESE, ESQ.; LAWRENCE CUZZI; ANTHONY
D'APOLITO; DAP CONSULTING, INC.;
COMMONWEALTH LAND TITLE INSURANCE CO.;
NATIONS TITLE INSURANCE OF NEW YORK, INC.;
FIDELITY NATIONAL TITLE INSURANCE CO. OF
NEW YORK; COASTAL TITLE AGENCY; STEWART
TITLE GUARANTY COMPANY; IRENE DiFEO;
DONNA PEPSNY; WEICHERT REALTORS; and
VECCHIO REALTY, INC., d/b/a MURPHY REALTY
BETTER HOMES AND GARDENS,

Defendants.

:
:
: Judge Dickinson R. Debevoise
: Magistrate Judge Michael A. Shipp
:

: No. 97-3496 (DRD)(MAS)

: **NOTICE OF MOTION**

To: Robert A. Magnanini, Esq.
Stone Magnaini, LLP
150 John F. Kennedy
Short Hills, NJ 07078

PLEASE TAKE NOTICE that on January 18, 2012 at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall apply to the United States District Court for the grant of a motion for partial summary judgment in favor of Defendants, Fidelity National Title Insurance Co. of New York and Nations Title Insurance of New York, Inc. (collectively, "Fidelity") and against Plaintiff, Walsh Securities, Inc., as to certain title claims made by Walsh Securities, Inc. as part of its Fourth Amended Complaint.

PLEASE TAKE NOTE that in support of the motion, Fidelity submits a statement of undisputed material facts, the certification of Edward J. Hayes, the accompanying brief and a proposed form of Order.

The undersigned respectfully requests oral argument if timely opposition is filed.

s/David H. Colvin, Esquire
Edward J. Hayes, Esquire
David H. Colvin, Esquire

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Title Insurance of New York, Inc.

Dated: November 10, 2011